

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
UNITED STATES OF AMERICA,

– against –

No. 18-cr-439 (MKB)

TIM LEISSNER,

Defendant.
-----X

SENTENCING MEMORANDUM OF DEFENDANT TIM LEISSNER

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Defendant Tim Leissner respectfully submits this sentencing memorandum in support of his request for a time served sentence.

I. INTRODUCTION

For the last seven years Mr. Leissner has cooperated with the government. Since his arrest in June 2018, he has consistently and frequently provided the government with information, details, and documents about the 1MDB bribery scheme. He proffered for perhaps hundreds of hours. While Mr. Leissner only testified in a single jury trial, *United States v. Roger Ng*, the information he provided touched scores of rich and powerful individuals: sheiks from Abu Dhabi with immense wealth and state power, the former prime minister of Malaysia—who to this day remains a popular politician in his home country, and Goldman Sachs, the richest investment bank in the world.

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And so is his crime. Even after the case before this Court is long closed, Mr. Leissner's crime will follow him—likely forever. Indeed, just this week, public reporting confirmed that Mr. Leissner is likely to face yet more consequences for his crime. The Malaysian government is seeking Mr. Leissner's extradition to face charges there for these same 1MDB-related crimes: "Malaysia's government submitted an extradition request for Leissner to the U.S. Justice Department last August," and "[a]n Interpol red notice, making him subject to arrest almost anywhere in the world, was issued for Leissner in November." AnnaMaria Andriotis, "Disgraced

Ex-Goldman Partner Sought by Malaysia for Extradition in 1MDB Scandal,” *The Wall Street Journal* (May 6, 2025).¹

Even after seven years of continuous cooperation, and seven years of separation from much of his family, Mr. Leissner has no real prospect for putting the consequences of his crime behind him. That reality renders additional punishment from this Court unnecessary for Mr. Leissner. A time served sentence is sufficient but not greater than necessary for Tim Leissner. 18 U.S.C. § 3553(a).

II. TIM’S COOPERATION HAS PROFOUNDLY AND PERMANENTLY CHANGED THE COURSE OF HIS LIFE

A. Tim Readily Revealed the Depths of his Criminal Conduct and Endured Public Airing of his Personal Failings

Perhaps the most consequential decisions that Mr. Leissner made in his life were those to engage in the 1MDB criminal scheme, and to cooperate with the government. As soon as Tim was arrested, he decided to accept responsibility and work to make amends for his crime by sharing everything he knows with the government. In seven years, Tim has never looked back.

Before the crime was discovered, Tim’s participation in 1MDB brought him to the pinnacle of investment banking. That was the culmination of everything Tim strived for during his adult life. As Tim recognizes in his letter to the Court:

I had a relentless drive to succeed, to prove myself. I chased recognition at Goldman Sachs. I dreamed of becoming a partner, and when I achieved that in 2006, it still wasn’t enough. I needed to be the best, a hero on Wall Street. For a brief time, the 1MDB deals gave me that feeling. Then came my fall.

Ex. A, Tim Leissner Ltr. at 1. His fall from that height was both swift and complete. When murmurings about the crime began, Tim was fired from his position at Goldman Sachs, and

¹ Available at: <https://www.wsj.com/finance/disgraced-ex-goldman-partner-sought-by-malaysia-for-extradition-in-1mdb-scandal-8de522fd>.

effectively ostracized from the investment banking world. *See* Ex. B, May Leissner Ltr. at 2 (“His career has been destroyed and he cannot return to ever be in the financial service world again.”). At one time, the post at Goldman meant everything to Tim. *See* Ex. A, Tim Leissner Ltr. at 1. But while losing that position—a status symbol he spent decades yearning for—was the first consequence, it was neither the last nor the most severe.

Tim was arrested in June 2018. Almost immediately upon his arrest, he began cooperating with the government. In the seven years since, his cooperation has been extensive. He met with the government to proffer on dozens of occasions, perhaps more. He was forthcoming with the government about his participation in 1MDB, the details of the complex scheme, the individuals involved, and the financial gains, including how he and others used the proceeds. Early on, Tim was prepared to take the risk of proactive cooperation as well. *See id.* (“I cooperated with the government throughout this time, first covertly, and later publicly following my guilty plea. I testified against extremely powerful individuals, including senior government officials from Abu Dhabi, Malaysia, and China, where Jho Low—the fugitive central to this case—remains at large.”).

Tim’s cooperation culminated in ten days of testimony during the trial in *United States v. Roger Ng*, No. 18-CR-538 (MKB). Through his testimony, Tim painstakingly testified to the criminal conduct, bribery, and theft involved in the complex 1MDB bond offerings. His direct testimony explaining the crimes and the transactions lasted more than five days. Knowing that there were news reporters following his every word, Tim nonetheless unequivocally accepted responsibility for his criminal conduct to a packed public courtroom. *See* Ex. C, Tony Cataldo Ltr. (“he admitted guilt in the most public forum in the world to an audience that has judged him on news headlines only, without knowing the man.”). He also answered questions about his criminal conduct, and undertook the difficult task of looking his former friend and colleague Roger

Ng in the eye while explaining Ng's criminal role to the world. Tim likewise clearly testified to the involvement of far more public figures in Malaysia, Abu Dhabi, and of his former employer Goldman Sachs.

Tim's cross-examination was longer yet, lasting nearly six days of in court testimony. And it was painful in other ways. Tim's cross examination delved into his most personal foibles, including his family life, his financial indiscretions, and his infidelities. Tim recalls how "[r]eporters dissected every detail, broadcasting the most salacious parts across the globe. [He] stood exposed, fully vulnerable." Ex. A, Tim Leissner Ltr. at 2. Still, Tim calmly and truthfully responded to every question for the public record, no matter how embarrassing.

Tim's affirmative cooperation obligations did not end with his testimony in the *Ng* trial, however. Ancillary forfeiture proceedings remain ongoing. On April 25, 2025, just weeks ago, Tim was subject to more than eight hours of cross-examination in deposition testimony as part of the forfeiture proceedings in this case.

B. Mr. Leissner's Cooperation Assisted in Bringing Accountability for 1MDB and Making Victims Whole

Mr. Leissner's cooperation preceded the admission of guilt by Goldman Sachs Group, Inc. and its Malaysian subsidiary Goldman Sachs (Malaysia) Sdn. Bhd. (collectively "Goldman") for "conspiring to violate the Foreign Corrupt Practices Act (FCPA) in connection with a scheme to pay over one billion dollars in bribes to high-ranking government officials in Malaysia and Abu Dhabi to obtain lucrative business for Goldman Sachs." E.D.N.Y. U.S.A.O., "Goldman Sachs Resolves Foreign Bribery Case And Agrees To Pay Over \$2.9 Billion," (Oct. 22, 2020).² As part of the settlement with the Department of Justice, Goldman agreed to pay over \$2.9 billion in

² Available at: <http://justice.gov/usao-edny/pr/goldman-sachs-resolves-foreign-bribery-case-and-agrees-pay-over-29-billion>.

criminal penalties and forfeiture. Goldman also settled with foreign authorities in the United Kingdom, Singapore, and Malaysia to pay additional criminal penalties and forfeiture. *Id.*

Additional millions of dollars of forfeiture awards were also ordered from Roger Ng, Jasmine Loo who was the general counsel of 1MDB, Jho Low who remains a fugitive from justice but was subject to forfeiture proceedings amounting to many millions of dollars, among others. *See, e.g.,* E.D.N.Y. U.S.A.O., “Justice Department to Recover Nearly \$85M in Additional Funds Linked to 1MDB Scheme,” (Jul. 23, 2024).³

Tim too has faced significant financial penalties for his part in the 1MDB offense. In addition to a forfeiture money judgment of \$43.7 million that Tim agreed to as part of his initial plea, he has forfeited his shares in Celsius Holdings, an energy drink company that Tim invested in initially in 2015. *See* PSR ¶ 164, 147 (“the Government advised that the defendant has agreed to forfeit all title and interest in the Celsius Holdings investment”). Per the PSR, the Celsius shares are “valued at more than \$400 million.” PSR ¶ 147. Forfeiting his shares in Celsius was more than a financial strike against Tim—it was a personal sacrifice too. He considered his investment in Celsius Holdings as “one of [his] greatest professional achievements;” Tim “was proud to have helped build that company from \$15 million in annual revenue in 2015 to over \$1.5 billion today.” Ex, A, Tim Leissner Ltr. at 2. Still, Tim readily accepted his forfeiture obligations as “the right thing to do.” *Id.*

Ultimately, the forfeiture recovered through the 1MDB cases in which Tim cooperated exceeded even the billions of dollars in losses to the Malaysian government that the 1MDB crime caused. At this point, seven years into Mr. Leissner’s cooperation, the government reports that

³ Available at: <https://www.justice.gov/archives/opa/pr/justice-department-recover-nearly-85m-additional-funds-linked-1mdb-scheme>.

“the victim of this offense (IMDB/the Malaysian government) was repaid in excess from a variety of sources.” PSR ¶ 84.

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In Tim's own words: "I knew I had played a role in a complex and damaging conspiracy, and I was determined to do my part to expose it." Ex. A, Tim Leissner Ltr. at 1. Of course, those are not just words. Tim has lived up to his determination through his seven years of intense cooperation

III. TIM HAS ENGAGED IN SEVEN YEARS OF SELF REFLECTION AND SELF IMPROVEMENT: HE HAS HARNESSSED HIS REGRET FOR HIS CRIMES TO REORIENT HIS LIFE

A. Tim has Internalized the Severity of his Crime; he has Refocused his Life Accordingly

While Tim's cooperation may have begun as a narrow endeavor, a means of handling his criminal conduct and its consequences, over the last seven years, the experience became transformative. He no longer focuses his energy on pursuing personal advancement. Instead, after years of soul searching, and understanding the roots and reverberations of his crime, Tim has totally reoriented his life. His friends and family have taken note. Tim's step-brother, Frank Fischer has perceived a profound change in Tim:

I believe that Tim's extensive cooperation with the prosecution that included disclosing humiliating details of his private as well as professional life has clearly shown that he wants nothing more than to turn his life around. The publication of these very personal particulars, must have been deeply felt as personal shame by him, but did not deter him from full assistance of the prosecution over many years. This shows to me that he is truly accepting responsibility for his offences and is expressing deep remorse.

Ex. B, Frank Fischer Ltr. Tim's brother Kay echoes that view:

He has pleaded guilty to wrongdoing, and he has assisted in bringing to light what truly happened. In doing so he has accepted public humiliation, which must be very difficult for[] him. I am glad he did so. I believe it shows that he has learned f[ro]m his mistakes and is willing to correct his actions as much as possible.

Ex. B, Kay Leissner Ltr. at 2.

In addition to accepting responsibility before the government, and publicly in this courtroom, Mr. Leissner undertook the hard work of explaining his failings to his closest friends

and family. Tim has been open about his “regrets for wanting to be a hero in the investment banking world,” and how he “learned from his mistakes” the hard way. Ex. C, Tony Cataldo Ltr. His friends have witnessed that “Tim has atoned for his sins and the wrongs he has admitted to. No doubt those were grave mistakes, which he has recognized himself as such.” *Id.* Tim’s friend and business associate Tony Cataldo’s discussion of Tim’s open and abject remorse is poignant:

He has talked to me about his regrets for wanting to be a hero in the investment banking world. In no way do I see Tim as someone who is interested in material wealth. I have seen him suffer greatly under the pressures that the last few years have brought. I witnessed the real death threats against him and how his former employer, Goldman Sachs, decided to throw him under the bus very publicly when in fact the organization had gained more than he had and many others more senior than him were in the know - none of whom have been brought to justice.

Id.; *accord* Ex. C, Tyler Hogue Ltr. (“Tim has been honest about his mistakes and taken responsibility.”).

Tim’s father is similarly candid about his son’s transformation in the seven years of his cooperation, explaining that: “He has since accepted responsibilities and despite a period of great ambition propelled by an ambitious firm’s culture of constantly demanding more of it[]s team, his desire to please and go above and beyond, and frankly greed, Tim has returned to his roots.” Ex. B, Bernd Leissner Ltr. at 2. Tim’s brother, Kay Leissner, has seen the same: “Tim has shown real remorse, regrets deeply what he did.” Ex. B, Kay Leissner Ltr. at 2; *accord* Ex. C, John T. Furlow Ltr. at 1 (“Tim Leissner understands his responsibility in this matter. He fully comprehends that an alternative course of action should have been pursued rather than the one he selected. Tim understands and regrets his actions and is accountable for them.”).

Tim’s ex-wife, Afsaneh Ghaderi, who has known Tim since they were just students, offers a window into Tim’s evolution in the last seven years:

The upheavals of the past few years have given Tim the much-needed space and time for deep reflection about the whirlwind of events into which he was drawn. He has faced the ordeal he has been going through in the past few years with

remarkable courage and dignity. Along the way, he has redeemed the soul he had lost. Tim is profoundly sad for what has happened and deeply regrets his actions.

Deep inside he has remained true to himself and to the values that his parents instilled in him.

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B. Tim has Focused his Professional Talents Into Projects that Promise to Meaningful Help Improve Peoples' Lives

Tim's ex-wife Afsaneh sees that because of the internal work he has done during the pendency of his cooperation, "Tim has all the potentials to be a force for good not only to his young family and his aging parents, but also in the society." Ex. B, Afsaneh Ghaderi Ltr. And that is precisely what Tim is trying to do. Far from the world of high finance that he used to inhabit, Tim now is putting his time and talents towards loftier goals: helping the victims of human trafficking, as well as assisting companies promoting scientific and medical advancement.

Rather than using his business and finance acumen simply to make money for himself and wealthy investors, Tim has consulted for a smaller business entrepreneurs promoting cutting edge medical projects in the fields of cancer research, and degenerative eye diseases. *See* Ex. C, Tony Cataldo Ltr. ("Tim Leissner has been a key senior advisor to EIR and my previous cancer-focused entity, GT Biopharma.").

For example, Tim has volunteered his time to advising "Biopharma, Inc. . . an early stage privately held biotech company developing therapeutics for the treatment of eye diseases." Ex. C, Tony Cataldo Ltr. Biopharma has successfully "partnered with the University of Miami's Bascom

Eye Institute for the treatment of glaucoma, and the Weill Cornell Medical College of Cornell University for the treatment of atrophic ‘dry’ age-related macular degeneration.” *Id.* These projects promise real relief to people suffering from these severe eye diseases.

But bringing widespread medical access requires funding, and the founders of Biopharma struggled to navigate the world of finance on their own. Tim’s expertise has been particularly helpful. As Biopharma’s founder explains:

I have worked with him over the last five years, and he has been a great partner and friend to me personally and the team collectively. He has mentored us when we had any kind of business or financial question and has always been very generous with his time and experience. I see in Tim someone who has made the transition from being a corporate business leader to a god loving supporter of causes that make a real difference. He feels passionate about our efforts to help those with diseases whether it was cancer in the case of GT or going blind with respect to EIR.

Id.

Tim has also used his business knowledge to work “on carbon reductions in a venture called Green Cities Capital.” Ex. C, Davinder Singh Sehra Ltr. at 1. GC Capital “connect[s] transformative environmental projects with organizations dedicated to real climate action.” *Id.* Funding and financing projects are crucial to the success of GC Capital’s environmental projects, and “Tim is a major component for the success of this. Tim has great talents and a brilliant mind when it comes to the structuring and funding of our efforts and projects. He is bringing his strengths to bear as a change agent for the good.” *Id.* at 1-2.

Perhaps Tim’s biggest contributions have been to an organization that assists victims of human trafficking called Freedom Shield Foundation. Tim’s work for Freedom Shield takes him far from his old world of money and high finance, to a world of human trauma, tragedy, and poverty. Through Freedom Shield, Tim has invested not just money, but his time, and effort “distribut[ing] . . . food and essential items to less fortunate families in the Dallas Fort Worth area. This resulted in 3,300 families receiving this food and essential items.” Ex. C, John T. Furlow Ltr.

at 1. Tim has spent days engaging in the “physical[ly] demand[ing]” labor of “unloading trailers in high heat months” in Texas. Ex. C, Rolando Lopez Ltr at 1 (“Tim has contributed on countless occasions with Operation Zip Code, which is an effort launched by FSF many years ago to distribute food and essential items to families in need in some of the poorest parts of the Dallas Fort Worth area. Over the years we have distributed more than \$3 million worth of food in high food insecurity neighborhoods. I am proud of Tim’s contributions and his dedication to our efforts amidst all the physical demands of unloading trailers in high heat months.”).

Through his work with Freedom Shield, Tim has also leveraged his broad base of contacts to help individuals stuck in truly dangerous and precarious situations. Last year, when the war between Israel and Hamas commenced in Gaza, a number of American citizens were stuck in Gaza. Through his years as a banker working internationally, Tim has connections all over the world. When his friend from Freedom Shield called on him to help, Tim did not hesitate. He assisted with “the rescue of several hundred US citizens stuck in Gaza.” Ex. C, Joseph Brosler Ltr. at 1 (“Mr. Leissner has the intelligence, strength and connections to help people all over the world as he has proved by . . . his involvement in the Freedom Shield Foundation, Operation Zip Code and the rescue of several hundred US citizens stuck in Gaza in conjunction with the Hawkwind group.”); *accord* Ex. C, John T. Furlow Ltr. at 1 (“It was through his efforts with Hawkwood Group LLC, Tim made a major contribution in the rescue of several hundred U.S. citizens from the current turmoil in Israel working to insure they were safely returned to their families”). Whereas Tim’s network was once a means of financial aggrandizement for him, it is now a source of help for others.

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Personally tending to those less fortunate, helping people who have experienced some of the worst human traumas, is part of Tim’s efforts to refocus his life—eschewing his years of pursuing material gain and stature. Tim is “not just seeking forgiveness; he’s actively working to

make amends and contribute to society in a meaningful way.” Ex. C, Tyler Hogue Ltr. (“He’s also dedicated himself to making a positive impact, working with nonprofits that fight human trafficking, serving in his church, and contributing to his community. He’s using his talents to make the world a better place. I believe that Tim’s actions since his offense demonstrate a genuine commitment to redemption.”).

By helping those in dire need, Tim is “trying to right the wrongs of his past conduct.” Ex. C, Rolando Lopez Ltr. at 1 (“Tim Leissner is an integral part of our rescue efforts. We met in 2019 and he at once agreed to be part of our efforts. He told me about his earlier life and the missteps for which he has taken full responsibility. He never tried to minimize his conduct in the past”). Tim’s parents have similarly reflected that Tim’s focus on charity work these last several years exhibits “Tim’s new sense of responsibility as a member of society and his heart of wanting to help others It is an honorable undertaking and one that we know brings him great satisfaction away from material gains.” Ex. B, Bernd Leissner Ltr. at 2.

Tim’s transformation has been total. He has publicly admitted to his crime, worked to make amends through his cooperation, and refocused his energies on making a positive impact on those most in need. Tim “has dedicated his new life to again helping others.” Ex. B, May Leissner Ltr. at 2.

IV. TIM’S FAMILY IS HIS FIRST PRIORITY

A. Tim Has Spent Seven Years Actively Making Amends to his Family

In coming to terms with his conduct, Tim has finally internalized that the people who have suffered the most are those nearest to him: his children. During his older children’s young childhoods, Tim was constantly traveling for his work at Goldman Sachs. And in the last seven years, he has been prohibited from leaving the United States, thus precluded from spending much time with his oldest children who grew up in Hong Kong. Although he cannot undo what has

happened, Tim is actively working to repair his relationship with his children. He knows that he missed out on so much of their early lives, but that is the past. He is determined to give his children the love and support they need from their father.

Mr. Leissner is the biological father of three children: Anastasya who is 22, Angelina who is 19, and [REDACTED] who is 10. PSR ¶¶122-23. He also adopted 15 year old Gary Foster, whose parents were unable to care for him. Tim shares a close fatherly relationship with Gary, as he does with his biological children. PSR ¶ 125.

Mr. Leissner's daughters, Angie and Anastasya, grew up living with their mother Judy Chan in Hong Kong. PSR ¶ 122. Mr. Leissner and Ms. Chan divorced in 2013. The divorce and Mr. Leissner's formal separation from his family took a real toll on everyone—as did the consuming nature of Mr. Leissner's work at Goldman Sachs. He missed so much of his children's young lives because of the choices he made to prioritize his work for Goldman Sachs over everything else. *See* Ex. B, Angelina Leissner Ltr. (“I am not going to write to you about how he was there at all the biggest milestones of my childhood because he was not. He was always working.”).

Mr. Leissner's cooperation brought the frenetic pace of his life to a stop. And he has devoted the last seven years to trying his best to repairing his relationship with his children. In his last seven years of reflection, Mr. Leissner has internalized that the same inclination that he indulged in committing this crime, also distanced him from his family. Mr. Leissner now knows exactly how seriously he let his children down; he understands the impact on them that he was an absentee father, telling the Court: “I have deprived my children their right to time with me as a parent. Ex. A, Tim Leissner Ltr. at 2. But in the last seven years, he has come to terms with “[t]he undisputable truth is that no professional accolade can outweigh the anguish of missing those I

love most. Their absence in my daily life has left a wound louder than any worlds can describe.”
Id.

Mr. Leissner’s daughters, who are young adults in college, beautifully describe the details of how their father “has really stepped up” to be the father they need. Ex. B, Anastasya Leissner Ltr. at 3. “He is more present in [their young adult] li[ves] now being thousands of miles away then he was previously.” Ex. B, Anastasya Leissner Ltr. at 3-4. That his children now feel that they can rely on their father for anything, means everything to Tim. *See* Ex. A, Tim Leissner Ltr. at 2 (“All I seek to do now, is devote my time to what matters the most - my children and my parents as every available second is becoming more valuable. I am dedicated to them. They have borne the weight of my absence, and I long to give them the time, love, and presence they deserve.”).

Mr. Leissner’s older daughter, Anastasya, writes the Court about the close relationship she has developed with her father—Tim has focused on repairing his relationship with his children, and prioritized maintaining a daily presence in their young lives. Anastasya explains that she:

[W]ould call him when I would get upset and he would speak to me for ages and for the next couple of days after, he would call and text me to check up on me. I am such a family person and in the past couple of years, I truly looked forward to visiting him. Especially now that I am at University in the UK and being so far away again, I constantly think about the next time I will see him. My dad now calls me every single day, when we don’t speak for a day, we jokingly say we haven’t spoken in ages.

Ex. B, Anastasya Leissner Ltr. at 3.

After years of estrangement, Anastasya is now so close to her father that she looks forward to sharing even the most mundane aspects of her life with him: “I speak about the things I am learning at university and I share every school assessment result with him.” Ex. B, Anastasya Leissner Ltr. at 3; *accord* Ex. B, Angelina Leissner Ltr. (“One thing that I have never doubted in my life was how much he loved his children. From the cheesy texts he sends about father-daughter

relationships, to his willingness to listen to our ridiculous stories that he probably does not care one bit about.”). [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Tim’s mother is proud of the tremendous positive impact that Tim has finally started to make in his children’s lives:

As [Tim’s daughters] become young ladies and are going through university and Tim has more time, I can see how close they have become. The same is true for his 8-year old son, Wolfe. I know he spends as much time with him as possible and he is developing into a very kind young man as a result. I am so happy that the children’s lives turned to better, with their father by their side.

Ex. B, May Leissner Ltr. at 1.

For the first time since she was a small child, Anastasya has come to really cherish the one-on-one time she shares with her father. After they “spent 2 weeks in NYC last summer together,” and when it came time for her to return to Hong Kong, Anastasya “cried so much when [she] said goodbye to him.” Ex. B, Anastasya Leissner Ltr. at 3. That moment “was so weird because I haven’t cried like that saying goodbye to him in years. I felt like the little girl I used to be crying when he would leave for work trips and it was the first time I felt like our relationship was close to being back to how it was before.” *Id.*

Angie too describes how “recently” she has learned to look to her father, who waits eagerly to help guide her through life’s obstacles, whether big or small. Ex. B, Angelina Leissner Ltr. After years of strain on their relationship, Angie recounts that: “recently, he taught me how to drive. But recently, he helped me change my tire. But recently, he helped quiz me for a midterm I was worried about.” *Id.* Tim is showing his daughters with his actions that *they* are his first priority in life. “He is making up for lost time; he is trying.” *Id.* (“I tell you these things because

I am finally getting to do the things that ‘traditional’ fathers and daughters do.”). Angie explains that although “I feel as though I have not been able to spend enough time with my dad,” the concrete investment in his daughters has made a big difference in making up for the void that he left in their young lives. *See id.* (Angie has “forgiven him for that because of his recent efforts.”).

But Angie, at 19, is still at a vulnerable young age. And now that she finally has the paternal love and guidance she missed for so long, separation from her father would be devastating. Angie is clear: “I am at a time of my life where I need him more than ever.” *Id.* (“And we need more time. We need more time for him to show his good side that I know he has. We need more time for him to right his wrongs.”); *accord* Ex. B, May Leissner Ltr. at 1 (“Today, the girls need Tim now more than ever.”).

B. Tim’s Bail Restrictions Prevented him From Spending Significant Time with his Children and Parents Who Live Abroad

Although making up for lost time with his family is the thing that Tim wants most, much of his family have lived far away from his home in the United States, where Tim has not left since his arrest in 2018. Specifically, Tim’s daughters grew up in Hong Kong, and his elderly parents, who are 83 and 87 years old have lived most of their lives in Europe.

Since his arrest in 2018, Mr. Leissner has lived with restrictive bail conditions. Initially, his travel was limited to parts of California where he lived, and New York City for purposes of his cooperation. For four years, he wore an ankle monitor to track his location, and was subject to a curfew. His travel remains severely restricted even within the United States, including just New York, California, and Dallas where he lives.

Most of Tim’s family remained abroad throughout his cooperation. So Tim has continued to miss out on so much. While he shows his children and his parents how he cares for them by being available to them, his bail conditions have meaningfully hampered his ability to show up for

his family in person. Tim's daughters know that they can finally count on their father, but they also recognize the painful reality that for the last seven years, his travel to them is limited because of his crime. Anastasya perhaps puts it best: "He has sacrificed missing out on Angie and my life in the past few years in order to repay for what he has done." Ex. B, Anastasya Leissner Ltr. at 4.

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[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

The distance from his parents, who have lived most of their lives in Europe and now live in Florida, is also painful for Tim and his family. Tim’s parents have aged significantly these last seven years. Tim has understood the hard way “[o]ver these past seven years . . . the irreplaceable value of time” as he has “watched [his] parents age . . . from afar.” Ex. A, Tim Leissner Ltr. at 2.

[REDACTED]

[REDACTED]

Tim's bail restrictions also precluded him from participating in many more mundane, but nonetheless truly meaningful, family gatherings. Tim's crime and cooperation have imposed a real cost on his family. Mr. Leissner's elderly parents who "will never abandon [their] beloved son and will do everything to restore his life to some kind of normalcy," have felt the distance acutely. Ex. B, Bernd Leissner Ltr. at 1. For the last nearly seven years of separation, Tim's parents "have missed much of this final stage of our life with [their] son. . . . the distance with Tim confined not being able to travel to visit us, ha[s] been exceedingly hard on the entire family." *Id.*

The family has felt a gaping void in Tim's absence. As Tim's parents explain: "The last . . . years and more have been very difficult for us. We have celebrated many Christmases and holidays with Tim's daughters and the rest of the family with his place being empty. We have felt Tim's pain and loneliness during this time and his longing for his family." *Id.* at 2; *accord* Ex. B, May Leissner Ltr. at 2 ("We have missed Tim so much, never able to celebrate Christmas or birthdays together."). [REDACTED]

Tim's painful separation from his daughters and his elderly parents, at a time when he wants nothing more than to make amends, has been a real punishment for Tim over the last seven years.

V. [REDACTED]

[illegible]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

VI. CONCLUSION

For the reasons stated above, Defendant Tim Leissner respectfully requests that this Court impose a time served sentence, which would be sufficient but not greater than necessary to accomplish the objectives set forth in 18 U.S.C. § 3553(a).

Dated: May 8, 2025
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Respectfully submitted,

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